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IMPOSSIBLE FOODS INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IMPOSSIBLE FOODS INC., a Delaware
corporation,

Plaintiff/Counter-Defendant

v.

IMPOSSIBLE LLC, a Texas limited liability
company, and JOEL RUNYON,

Defendants/Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

~~PROPOSED~~ ORDER GRANTING
PLAINTIFF/COUNTER-DEFENDANT
IMPOSSIBLE FOODS INC.'S
REQUEST TO SEAL DOCUMENTS

Judge: Hon. Beth Labson Freeman

~~PROPOSED~~ ORDER


The Court, having considered Plaintiff/Counter-Defendant Impossible Foods Inc.'s
("Impossible Foods's") Statement in Support of Sealing, ECF No. 294, hereby **GRANTS**
Impossible Foods's motion and **ORDERS** the following material to be maintained under seal:

| ECF/Exhibit No. | Document | Portion to Seal | Reasons for Sealing |
|-----------------|---|---|---|
| 284-2 | Ex. 1 to Cashman Sealing Declaration: Defendants/Counter-Plaintiffs Impossible LLC and Joel Runyon's Notice of Motion and Motion for Rule 11 Sanctions | Highlighted portions at 1:8-10; 3:1-4, 7-9, 11-28; 4:1-2, 4-17, 19-26; 5:1-19, 24-28; 7:16-17, 22-28; 8:1-22, 26-27; 9:1-10, 24-26. | GRANTED. The information contains Impossible Foods's confidential and highly confidential business strategy and financial information and data, including information regarding revenue, expenditures, marketing strategies, and litigation strategies. Public disclosure of this information would result in economic harm and significant competitive disadvantage to Impossible Foods. |
| 284-4 | Ex. 3 to Cashman Sealing Declaration: Ex. D - Portions of the transcript of the deposition of John Plumpe, taken on June 25, 2025. | Entire document | GRANTED. The information contains Impossible Foods's highly confidential litigation strategies, including information regarding its approach to expert witnesses and trademark enforcement efforts. Public disclosure of this information would result in economic harm and significant competitive disadvantage to Impossible Foods. |
| 284-6 | Ex. 5 to Cashman Sealing Declaration: Ex. G - Portions of the transcript of the deposition of Caitlyn Hatman, taken on April 1, 2025. | Entire document | GRANTED. The information contains Impossible Foods's confidential and highly confidential business strategy, including information regarding trademark enforcement and marketing strategies. Public disclosure of this information would result in economic harm and significant competitive disadvantage to Impossible Foods. |
| 284-8 | Ex. 7 to Cashman Sealing Declaration: Ex. I - Letter from Adam S. Cashman to Forrest Flemming III, dated April 11, 2025. | Portions identified below: (1) Page 1, paragraph 1, line 7 beginning at "because" and ending at "IFI's" | Public disclosure of this information would result in economic harm and significant competitive disadvantage to Impossible Foods. |

| ECF/Exhibit No. | Document | Portion to Seal | Reasons for Sealing |
|-----------------|--|---|---|
| | | (2) Pages 2-3, complete excerpt from deposition of Caitlyn Hatman (3) Page 3, paragraph 1, last two sentences beginning at line 6 (“IFI’s own”) through line 9 | |
| 284-7 | Ex. 6 to Cashman Sealing Declaration: Ex. H - Portions of the transcript of the deposition of Keaton Schwarz, taken on April 3, 2025. | Entire document | GRANTED. The information contains Impossible Foods’s confidential and highly confidential business strategy and financial information and data, including information regarding revenue, expenditures, and sales. Public disclosure of this information would result in economic harm and significant competitive disadvantage to Impossible Foods. |

IT IS SO ORDERED.

DATED: October 3, 2025


 Hon. Beth Labson Freeman
 United States District Judge